

**BARASCH MCGARRY SALZMAN & PENSON**

**ATTORNEYS AT LAW**

MICHAEL A. BARASCH

BARRY A. SALZMAN\*

DOMINIQUE A. PENSON

BRUCE KAYE

SARA DIRECTOR

DANA CUTTING

\*ADMITTED IN NY & CT

11 PARK PLACE

SUITE 1801

NEW YORK, N.Y. 10007

(212) 385-8000

1-800-562-9190

Fax No. (212) 385-7845

[www.baraschmcgarry.com](http://www.baraschmcgarry.com)

LEE LONDON

MARIYA ATANASOVA

JAMES STEINER

JENNIFER JIMENEZ

REBECCA BRENNAN

TRAVIS CARTER

TREVOR TAYLOR

January 15, 2020

**VIA ECF**

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

The Honorable Sarah Netburn  
U.S. Magistrate Judge  
United States District Court  
District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

*Basci, et al. v. Islamic Republic of Iran*, 20-cv-00415. (member case of Federal Insurance Co., et al. v. al Qaida et al., No. 03-cv-06978 and Ashton, et al. v. al Qaeda Islamic Army, et al., No. 02-cv-06977)

Dear Judge Daniels and Magistrate Judge Netburn:

As required by the Court's October 28, 2019 Amended Order Approving Notices to Conform, Short Form Complaints and Notices of Amendment (ECF Doc. 5234), we submit this letter on behalf of the *Basci* Plaintiffs, who have filed a Short Form Complaint against the Islamic Republic of Iran ("Iran") and write to request that the action be made part of this multi-district litigation (03 MDL 1570). We have also filed a Related Case Statement on the civil docket, explaining why the newly filed case is related to 03 MDL 1570.

We will be filing a motion for partial final default judgments against Iran for the *Basci* Plaintiffs in order to submit their applications to the United States Victims of State Sponsored Terrorism, which we hope to do on or before February 19, 2020, which is the last day for new claimants to file applications for consideration in the third round of payments.

Respectfully,

/s/ Barry Salzman

Barry Salzman

cc: All counsel via ECF